

From: [Dan Peacock](#)
To: [Bill Jacobs](#)
Subject: Fw: Consumer Bait Station Question
Date: 08/26/2008 11:17 AM

Bill,

SRRD has made the decision and informed Bell that the refillable bait station refill does not need to contain the initial placement inside.

Thank You,

Daniel B. Peacock, Biologist
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Addresses:
United States Postal Service (USPS): USEPA, Insecticide-Rodenticide Branch,
Registration Division (7504P), 1200 Pennsylvania Ave. NW, Washington, DC 20460-0001

Courier Deliveries: USEPA, Insecticide-Rodenticide Branch, Registration Division,
Room S-4900, One Potomac Yard, 2777 Crystal Drive, Arlington, VA 22202

----- Forwarded by Dan Peacock/DC/USEPA/US on 08/26/2008 11:15 AM -----

**Russell
Wasem/DC/USEPA/US**

08/21/2008 12:14 PM

To "John Lublinkhof" <jlublinkhof@belllabs.com>
cc Laura Parsons/DC/USEPA/US@EPA, Dan
Peacock/DC/USEPA/US@EPA, John
Hebert/DC/USEPA/US@EPA
Subject Re: Consumer Bait Station Question 

Good Afternoon John,

If a consumer size bait station is to be sold with bait block refills (no more than 1 lb total on the consumer market) the refillable bait station does not need to be prepackaged with a bait placement inside.

Regards,

Rusty_____

Rusty Wasem
Chemical Review Manager
Reregistration Branch I
Special Review & Reregistration Division
(703)305-6979

▼ "John Lublinkhof" <jlublinkhof@belllabs.com>

"John Lublinkhof"
<jlublinkhof@belllabs.com>

To Russell Wasem/DC/USEPA/US@EPA
cc

08/19/2008 05:37 PM

Subject Consumer Bait Station Question

Dear Rusty,

We have had internal meetings to plan for the requirements in response to the mitigation decision for rodenticides.

On page 17 under "A. Summary of Restrictions, 1. Consumer Size Products (Containing First-Generation Anti-coagulants and Non-Anticoagulants Only)" , it states that "Consumer size bait products must be sold with ready-to-use (one-time use or refillable) bait stations..." Under the last point, it states that "A retail package containing a bait station may contain up to a maximum of 1 pound of bait for either mouse or rat control (the 1 pound limit includes the initial bait placement inside the bait station, plus any bait refills."

The first statement is straight forward but the second statement implies that the bait station is to include the initial bait placement. Is this necessary? From a manufacturing standpoint it is much easier to package the refillable bait station (without the bait placement inside) and then package this with 16 x 1 oz. bait blocks (or another smaller quantity. the refillable bait but not have one bait placement already prepackaged. Is this allowed? (Of course, this wouldn't apply to a disposable bait station which would have the bait placement inside the station since it is completely sealed).

Could you please clarify this?

Thanks,

John Lublinkhof
Bell Laboratories, Inc.
608-241-0202 Ext. 3138